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9 Attorney for Defendant Todd Johnson

10
11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA
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14 * * *

15 UNITED STATES OF AMERICA)

16 Plaintiff,)

17 vs.)

18 REGGIE PRATT, et. al.,)

19 Defendant.)

20 **CASE NO.: 2:16-CR-00052**

21 **TODD JOHNSON'S UNOPPOSED**
22 **MOTION TO CONDUCT**
23 **A PRE-PLEA PRESENTENCING**
24 **INVESTIGATION REPORT AND**
25 **PROPOSED ORDER**

26
27 Comes now, appointed counsel Phil Brown Esq., and hereby moves this Court request a
28 Pre-Plea Pre-Sentence Investigation Report be prepared by the Probation department.

1) The calculation of Defendant Todd Johnson's criminal history will drastically impact
his sentencing exposure, negotiations, and client's decision as to how he should proceed. A pre-

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1 plea presentence report will promote judicial economy and aid in the manner in which this case
2 is ultimately resolved.

3 2) Undersigned counsel therefore respectfully requests an order that the Department of
4 Probation conduct a pre-plea presentence investigation report as soon as possible.
5

6 3) Undersigned counsel has spoken to the prosecutor, Assistant United States Attorney
7 Phillip Smith regarding this request and he has no opposition.
8

9 DATED this 23rd day of August, 2016.
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11
12 /s/ Philip H. Brown

13 Philip H. Brown, Esq.
14 200 Hoover Ave, Suite #130
15 Las Vegas, Nevada 89101
16 Attorney For The Defendant
17 Todd Johnson
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7 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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10 UNITED STATES OF AMERICA)

11 Plaintiff,)

12 vs.)

13 TODD JOHNSON,)

14 Defendant.)
15)
16)

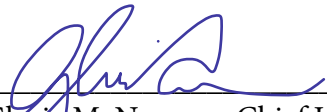
CASE NO.: 2:16-CR-00052

ORDER

17 **IT IS HEREBY ORDERED** that Defendant Todd Johnson's Unopposed Motion for
18 a Pre-Plea Presentence Investigation Report (ECF No. 89) is **GRANTED**.

19 **IT IS FURTHER ORDERED** that the United States Probation Office shall prepare
20 and provide to the Court by October 24, 2016, a Pre-Plea Presentence Investigation Report
21 with the guideline calculation requested for Defendant's **criminal history only**.

22 **DATED** this 23 day of August, 2016.

23
24 
25 Gloria M. Navarro, Chief Judge
26 United States District Court
27
28

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee of Brown Law Offices, Chartered, and is a person of such age and discretion as to be competent to serve papers.

That on August 23, 2016, he served an electronic copy of the above and foregoing UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCING INVESTIGATION REPORT by electronic service (ECF) to the person named below:

DANIEL BOGDON
United States Attorney

PHILLIP SMITH, ESQ.
Assistant United States Attorney

PAOLA ARMENI, ESQ.
Attorney for Dywon Johnson

OSWALDO FUMO, ESQ.
Attorney for Torrence Douglas

JENNIFER WALDO, ESQ.
Attorney for Antoine Evans

KAREN CONNOLLY, ESQ.
Attorney for Reggie Pratt

DAVID BROWN, ESQ
Attorney for Antonio Randolph

RANDALL ROSKE, ESQ.
Attorney for Dominique Grace

JOHN G. GEORGE, ESQ.
Attorney for Ronald Smith

/s/ Mary D. Brown

Employee of Brown Law Offices, Chartered